

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-1(b)	
LAW OFFICES OF LEE M. PERLMAN Lee M. Perlman, Esquire Attorneys for Debtor 1926 Greentree Road, Suite 100 Cherry Hill, NJ 08003 856-751-4224	
In Re: William Hertzke Karen Hertzke	Case No.: 23-10104 MBK Chapter: 13 Hearing Date: [Hearing Date] Judge:

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION

The debtor(s) in this case opposes the following (choose one):

1. ☐ Motion for Relief from the Automatic Stay filed by _____, creditor,
A hearing has been scheduled for _____, at _____.

☐ Motion to Dismiss filed by the Chapter 13 Trustee.
A hearing has been scheduled for _____, at _____.

☒ Certification of Default filed by Albert Russo.
I am requesting a hearing be scheduled on this matter.

2. I oppose the above matter for the following reasons (choose one):

☐ Payments have been made in the amount of \$_____, but have not been accounted for. Documentation in support is attached.

☒ Payments have not been made for the following reasons and debtor proposes repayment as follows (explain your answer):

Our estranged son robbed us of \$6,000 this past summer while in town. This made keeping up with minimal expenses and payments to the trustee difficult. We are proposing to pay \$3,000.00 on 11/13/24 and then two (2) additional payments of \$2,500.00 in December 2024 along with filing a modified plan to include the sale of our property.

☐ Other (explain your answer):

3. This certification is being made in an effort to resolve the issues raised in the certification of default or motion.
4. I certify under penalty of perjury that the above is true.

Date: 11/06/24

/s/ William Hertzke

Debtor's Signature

Date: 11/06/24

/s/ Karen Hertzke

Joint-Debtor's Signature
